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**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,
 dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**STIPULATION REGARDING AVT
 NEVADA, L.P.'S APPLICATION FOR
 ADMINISTRATIVE EXPENSE CLAIM**

AVT Nevada, L.P. (“**AVT**”) and Cash Cloud, Inc. d/b/a Coin Cloud (the “**Debtor**” and, together with AVT, the “**Parties**”) hereby stipulate and agree as follows (the “**Stipulation**”):

RECITALS

A. On February 7, 2023 (the “**Petition Date**”), Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the District of Nevada (the “**Court**”), commencing the chapter 11 case (the “**Chapter 11 Case**”);

B. On July 11, 2023, an *Order Establishing Administrative Claim Bar Date For Filing Proofs Of Administrative Expense Claim And Approving Form, Manner And Sufficiency Of Notice Thereof* [ECF 823] was entered, setting a deadline of July 20, 2023 at 5:00 p.m. (prevailing Pacific Time) to file a Proof Of Administrative Expense Claim (“**Administrative Claim Bar Date**”);

1 C. Prior to the Administrative Claim Bar Date on July 19, 2023, AVT filed an
2 *Administrative Claim Form* [ECF 887], asserting that AVT is owed \$262,719.30 for post-petition
3 amounts due and owing under its lease with the Debtor under § 503(b)(1)(A);

4 D. The Debtor filed and obtained approval of its *First Amended Chapter 11 Plan of*
5 *Reorganization Dated August 1, 2023* (ECF 996, the “**Plan**”);

6 E. On February 2, 2024, after a preliminary ruling by the Court [*see* ECF 1576], AVT
7 filed an *Application for Allowance and Payment of Administrative Expense Claim* [ECF 1600] (the
8 “**Application**”), requesting allowing and payment of its \$262,719.30 administrative expense claim;

9 F. To resolve an anticipated objection by the Debtor, AVT has agreed to reduce its
10 administrative expense claim as set forth in this Stipulation;

11 G. The Parties have engaged in good faith negotiations to avoid the costs, expenses, and
12 uncertainty of further litigation and have reached an agreement that resolves the Application and any
13 objection thereto.

14 NOW, THEREFORE, the Parties stipulate and agree as follows:

15 **STIPULATION**

16 1. The above recitals are restated and incorporated by reference as though fully set forth
17 herein.

18 2. Following the execution of the Stipulation, the Debtor shall seek approval of this
19 Stipulation and entry of the Stipulated Order in the form attached to this Stipulation.

20 3. Pursuant to 11 U.S.C. § 503(b)(1)(A), AVT shall have an Allowed Administrative
21 Expense Claim (as defined in the Plan) against the Debtor’s estate in the amount of \$125,000.00,
22 which shall be paid as set forth in Section 3.1(a) of the Plan. AVT shall have no further Allowed
23 Administrative Expense Claims against Debtor’s estate.

24 4. The Debtor, its estate, and any successors thereto reserve all rights with respect to any
25 unsecured claims filed by AVT.

26 5. The Parties agree that the hearing on the Application set for April 17, 2024 at 9:30
27 a.m. shall be vacated.

28 *[Signature page follows.]*

1 STIPULATED AND AGREED BY:

2 **MICHAEL BEST & FRIEDRICH LLP**

FOX ROTHSCHILD LLP

3 By: /s/Justin M. Mertz
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